



3. Plaintiffs' alleged, in their Corrected Short Form Complaint, that Defendant, Unifirst Corporation a/d/b/a Uniclean Cleanroom Services (hereinafter "Unifirst"), violated M.G.L.C. 93A among various other allegations.

4. As a result of this allegation Plaintiffs' were required to provide Unifirst with pre-suit notice. As result issued a demand letter to Unifirst on December 20, 2013 which is attached hereto as Exhibit "B."

5. Plaintiffs' plainly stated their intention to formally bring suit against Unifirst once the time delays of pre-suit notice requirements had been met. Specifically paragraph nine (9) of Plaintiffs' Corrected Short Form Complaint states:

"Plaintiffs have sent or served the pre-suit notice or demand requirements necessary to bring the claims set forth below, as required under M.G.L.C. 93A. See attached Letter of Demand to UniFirst, attached hereto as Exhibit A. Plaintiff(s) do not now assert but will seek leave to amend to assert the following claims promptly after the time period for giving notice has expired:

- a. Count II Negligence and Gross Negligence (Against Unifirst);
- b. Violation of M.G.L.C. 93A;
- c. Loss of Consortium; and
- d. Punitive Damages"

6. The time period for providing notice to bring the claims set forth above has now expired.

7. Furthermore, Plaintiffs previously filed a motion to dismiss (Doc. No. 20) certain defendants, Ambulatory Care Center, LLC, St. Mary's Medical Center a/d/b/a St. Mary's Surgicare, and William A. Ante, which was granted by this Court on February 3, 2014 (See Docket Entry No. 21).

8. Plaintiffs' now seek leave of court to file an Amended Short Form Complaint to formally allege their causes of action against Unifirst and remove any and all previously dismissed defendants.

9. Notably, Federal Rule of Civil Procedure 15(a)(2) provides that, “the court should freely give leave when justice so requires.”

10. Unifirst cannot possibly claim any prejudice if Plaintiffs are allowed leave of court in order to properly enter their Amended Short Form Complaint into the record when all pre-suit notice requirements have been met.

11. Plaintiffs pray that the Court grant Plaintiffs’ leave of court to file the Amended Short Form attached hereto as Exhibit “C.”

**WHEREFORE**, Movers pray that leave of court be granted to Plaintiffs in order to file their Amended Short Form Complaint.

DATED this 10th day of March, 2014.

**Respectfully Submitted,**

/s/ Christopher L. Coffin

Christopher L. Coffin, La. Bar Roll #27902

Jessica A. Perez, La. Bar Roll #34024

PENDLEY, BAUDIN & COFFIN, L.L.P.

1515 Poydras Street, Ste. 1400

New Orleans, LA 70112

Telephone: (504) 355-0086

Facsimile (504) 523-0699

Email: [ccoffin@pbclawfirm.com](mailto:ccoffin@pbclawfirm.com)

Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of March, 2014, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all known counsel of record via electronic filing system.

/s/ Christopher L. Coffin  
Christopher L. Coffin